

Remedium

February 11, 2010

U.S. Environmental Protection Agency
EPR-SR
1595 Wynkoop Street
Denver, CO 80202

Attn.: Ms. Bonita Lavelle

Subject: OU3 RI/FS of the Libby Asbestos Site
Monthly Progress Report – January 2010

Dear Bonnie:

This progress report describes work completed during the month of January 2010, in accordance with Section IX of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study dated September 2007. A discussion of the actions taken, sampling results, planned activities, modifications, problems encountered, potential issues, anticipated delays, and solutions developed is provided below. Information by contractor is reported separately.

MWH

The following is a summary of the actions taken and progress made during January 2010.

A. ACTIONS TAKEN

- Continued preparation of the Phase III Field Sampling Summary Report (FSSR).
- Continued preparation of initial sections of the OU3 Remedial Investigation Report.

B. SAMPLING RESULTS

None.

C. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months.

- Deliver the Phase III Field Sampling Summary Report to EPA on February 1, 2010.
- Continue preparation of the OU3 Remedial Investigation Report.
- Review and comment on draft Phase IV Sampling and Analysis Plan(s) as they are issued by EPA.
- Participate in teleconferences and other meetings as requested by EPA.


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Robert J. Medler
Director
Remedium Group, Inc.

A Subsidiary of W. R. Grace & Co.
6401 Poplar Ave., Suite 301
Memphis, TN 38119-4840

Tel: (901) 820-2024
Fax: (901) 820-2061
Email: Robert.J.Medler@grace.com

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

None.

Parametrix

The following is a summary of the actions taken and progress made during the month of January 2010.

A. ACTIONS TAKEN

- Extracted and dried small mammal eye lenses.
- Continued small mammal data analysis.
- Continued coordination with histologist at Northwest Zoopath on small mammal tissues.
- Continued work on preparing the 2009 Small Mammal Program data report.
- Continued aquatic data (invertebrate, fish) data analysis.
- Continued preparation of 2009 aquatic program data report.
- Continued financial reporting, supervision and project management activities.

B. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months:

- Prepare and submit BTAG Subgroup recommendations memo (analytical, bioassay recommendations).
- Receive histology report from NorthWest Zoopath.
- Submit 2009 aquatic program data report.
- Submit 2009 small mammal program data report (field plus histology).
- Make recommendations on conduct of bioassay or alternative aquatic ecological assessment techniques.
- If a bioassay is deemed feasible given analytical challenges, prepare bioassay protocol.

C. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

The BTAG subgroup identified concerns with the analytical method(s) used for asbestos in surface water with regard to the reporting of clumped versus free fibers and resulting implications of the method(s) to providing an understanding and basis for evaluating aquatic exposure (and potential toxicity) in a planned bioassay. The Subgroup is continuing its work to develop a memo with recommendations that include approaches

for addressing analytical method short comings, analytical challenges for conducting bioassays and any bioassay test modifications necessary should a bioassay be recommended.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Medler", with a stylized flourish at the end.

Robert J. Medler
Project Coordinator
Remedium Group, Inc.

cc: Michael DeDen - MWH
Lynne Gardner - Grace
John Garr - MWH
Robert Marriam - Grace
Sue Robinson - Parametrix
Dick Sloan - Montana DEQ